PROSKAUER ROSE LLP Sally L. Schneider 1585 Broadway New York, New York 10036 (212) 969-3803

Attorneys for Petitioners

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

PRESSROOM UNIONS' WELFARE TRUST

FUND, PENSION TRUST FUND and

LOCAL 51 EDUCATION, RELOCATION AND SUPPLEMENTAL UNEMPLOYMENT

BENEFITS FUND, by their Trustees,

08 Civ. 521 (RMB)

Petitioners, : **NOTICE OF MOTION FOR** 

**JUDGMENT** 

- against -

EVEREADY GRAPHICS, INC.,

Respondent.

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## SIRS:

PLEASE TAKE NOTICE that upon the Affidavit of Sally L. Schneider, sworn to on February 28, 2008, and the exhibits attached thereto, all of which are submitted herewith, and upon all papers and proceedings heretofore had herein, the undersigned will move this Court before the Honorable Richard M. Berman, U.S.D.J., at the United States Courthouse, 500 Pearl Street, New York, New York 10007 in Courtroom 21D, on March 26, 2008 at 9:00 am, or as soon thereafter as counsel can be heard, for entry of a Judgment in favor of petitioners Pressroom Unions' Welfare Trust Fund, Pension Trust Fund and Local 51 Education, Relocation and Supplemental Unemployment Benefits Fund and against respondent Eveready Graphics, Inc. in

the liquidated amount of \$9,231.62 for unpaid benefit contributions, interest, liquidated damages, costs and expenses, attorneys' fees and costs.

**PLEASE TAKE FURTHER NOTICE** that answering papers, if any, must be served on the undersigned attorneys for Petitioners and filed with the Court no later than March 17, 2008.

Dated: New York, New York February 28, 2008

> PROSKAUER ROSE LLP Attorneys for Petitioners

By: /s/ Sally L. Schneider
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TO: Eveready Graphics, Inc. 2526A Butler Place Bronx, New York 10461